

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION
CIVIL ACTION NO. 3:21-cv-03302-JMC-TJH-RMG

THE SOUTH CAROLINA STATE)
CONFERENCE OF THE NAACP,)
and)
TAIWAN SCOTT, on behalf of)
himself and all other similarly)
situated persons,) DEPOSITION
Plaintiffs,)
v.) OF
HENRY D. MCMASTER, in his) CHARLES J. BOYKIN, ESQ.
official capacity as Governor)
of South Carolina; THOMAS C.)
ALEXANDER, in his official)
capacity as President of the)
Senate; LUKE A. RANKIN, in his)
official capacity as Chairman)
of the Senate Judiciary)
Committee; JAMES H. LUCAS, in)
his official capacity as Speaker)
of the House of Representatives;)
CHRIS MURPHY, in his official)
capacity as Chairman of the)
House of Representatives)
Judiciary Committee; WALLACE)
H. JORDAN, in his official)
capacity as Chairman of the)
House of Representatives)
Elections Law Subcommittee;)
HOWARD KNAPP, in his official)
capacity as interim Executive)
Director of the South Carolina)
State Election Commission; JOHN)
WELLS, Chair, JOANNE DAY,)
CLIFFORD J. EDLER, LINDA MCCALL,)
and SCOTT MOSELEY, in their)
official capacities as members)
of the South Carolina Election)
Commission,)
Defendants.)

)

1 A. Because we have several, I don't want to
2 differentiate. I'll just have to leave it with that
3 general, you know, metropolitan areas.

4 Q. Okay. All right. I'm going to scroll down to the
5 next page on this document, and there's some
6 discussion of the Congressional Districts here, and
7 just so I'm clear, this deposition is taking part in
8 reference to the State House districts that were
9 recently enacted by the legislature. So I'm going
10 to skip over the Congressional part, but I'm going
11 to go back to what we were just talking about, where
12 it says, John Ruoff stated there are four large
13 areas of growth and he says they are all white
14 areas. Along the coast, top and bottom, Rock Hill,
15 Lancaster, and Greenville. Does that seem to be --
16 well, does that -- let me rephrase that. Is that
17 consistent with your understanding of growth in
18 metropolitan areas?

19 A. Yeah, that's my recollection.

20 Q. Okay. And do you have any reason to doubt Dr.
21 Ruoff's statement that the large growth in these
22 areas is -- or that the large growth occurred in all
23 white areas?

24 A. I would have no basis to doubt it. Correct.

25 Q. Okay. All right. I'm going to look towards the